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Docket No.: 52-025

ND-22-0103
10 CFR 52.99(c)(1)U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555-0001Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 3
ITAAC Closure Notification on Completion of ITAAC 2.6.09.08 [Index Number 650]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 3 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.6.09.08 [Index Number 650]. This ITAAC confirms that the illumination in isolation zones and exterior areas within the Protected Area is a minimum of 0.2 foot candles measured horizontally at ground level or, alternatively, sufficient to permit observation. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (NEI) 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52," which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,


Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.6.09.08 [Index Number 650]

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**Southern Nuclear Operating Company
ND-22-0103
Enclosure**

**Vogtle Electric Generating Plant (VEGP) Unit 3
Completion of ITAAC 2.6.09.08 [Index Number 650]**

ITAAC Statement

Design Commitment

8. Isolation zones and exterior areas within the protected area are provided with illumination to permit observation of abnormal presence or activity of persons or vehicles.

Inspections/Tests/Analyses

Inspection of the illumination in the isolation zones and external areas of the protected area will be performed.

Acceptance Criteria

The illumination in isolation zones and exterior areas within the protected area is 0.2 foot candles measured horizontally at ground level or, alternatively, sufficient to permit observation.

ITAAC Determination Basis

An inspection was performed to verify the Vogtle Electric Generating Plant (VEGP) Unit 3 isolation zones and exterior areas within the protected area are provided with illumination to permit observation of abnormal presence or activity of persons or vehicles. The inspection confirms the illumination in isolation zones and external areas within the protected area is a minimum of 0.2 foot candles measured horizontally at ground level or, alternatively, sufficient to permit observation, and satisfy the applicable illumination requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10CFR 73.55(i)(6)(ii). The VEGP Unit 3 Plant Security System ITAACs only cover the Unit 3 plant security system design commitment scope.

ITAAC Technical Report SV3-SES-ITR-800650 (Reference 1) documents the measurements taken of the illumination in isolation zones and exterior areas within the protected area. The measurements were taken horizontally at ground level with a calibrated light meter during clear weather conditions at night with no full moon. Ground level is considered to be approximately 6 inches above the ground or surface being tested.

The VEGP Unit 3 isolation zones and exterior areas of the protected area were divided into grid sections. Measurement of illumination levels in each section were taken at locations as determined in Reference 1. Criteria for selection of the measurement locations in each section included points on the extreme boundary of the section being measured, midpoints between the outdoor security lighting luminaries, corners at the intersection of exterior building walls, isolation zone corners, exterior area access doors to vital areas, and other exterior areas within the protected area and isolation zone areas of apparent low light within the section.

The results of the Unit 3 isolation zone and protected area lighting system inspection are documented in Reference 1 and confirm that the illumination in isolation zones and exterior areas within the protected area is a minimum of 0.2 foot candles measured horizontally at ground level or, alternatively, sufficient to permit observation of abnormal presence or activity of persons or vehicles, utilizing low-light technologies referenced in the VEGP Unit 3 and Unit 4 Physical Security Plan.

Reference 1 is available for NRC inspection as part of the Unit 3 ITAAC 2.6.09.08 Completion Package (Reference 2).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there were no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC 2.6.09.08 (Reference 2) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.6.09.08 was performed for VEGP Unit 3 and that the prescribed acceptance criteria was met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV3-SES-ITR-800650, SES Isolation Zone and Protected Area Illumination: ITAAC 2.6.09.08 (Security Related Information)
2. 2.6.09.08-U3-CP-Rev0, ITAAC Completion Package